

KAREN D. THACKER,
Plaintiff,

v.
CAROLYN W. COLVIN,
Acting Commissioner of Social Security,

Defendant.

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Case No. 15-cv-00466 RCJ-PAL

**UNOPPOSED MOTION
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”) respectfully requests that the Court extend the time by forty-five (45) days, to January 18, 2016, for Defendant to file her Answer to the Complaint. It is currently due on December 7, 2015.

An extension of time is needed to file Defendant's Answer because the Office of Disability Adjudication and Review (ODAR) requires additional time to prepare and produce the certified administrative record in this case. Additionally, Counsel for Defendant has been assigned to another

1 workload and all of her cases are being reassigned. Thus, an extension of time is required to complete
2 the reassignment. This request is made in good faith with no intention to unduly delay the proceedings.

3 Counsel for Defendant conferred with Plaintiff's counsel, Marc V. Kalagian, on December 3,
4 2015. He stated that he would not oppose this motion.

5 Respectfully submitted this 3rd day of December 2015.

6 DANIEL G. BOGDEN
7 United States Attorney

8 /s/ Tova D. Wolking
9 TOVA D. WOLKING
Special Assistant United States Attorney

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11 OF COUNSEL:

12 DEBORAH LEE STACHEL
13 Acting Regional Chief Counsel, Region IX

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15 IT IS SO ORDERED:

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17 UNITED STATES MAGISTRATE JUDGE

18 DATED: December 4, 2015

CERTIFICATE OF SERVICE

I, Tova D. Wolking, certify that the following individuals were served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service identified below:

CM/ECF:

Marc V. Kalagian
Law Offices of Rohlfing & Kalagian, LLP
211 East Ocean Boulevard, Suite 420
Long Beach, CA 90802

Leonard Stone
Shook & Stone, Chtd.
710 South 4th Street
Las Vegas, NV 89101

Dated this 3rd day of December 2015.

/s/ Tova D. Wolking
TOVA D. WOLKING
Special Assistant United States Attorney